

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**v.**

**D-1, THOMAS BERLUCCHI,**

**CRIMINAL NO.**

**HON.**

**VIOLATIONS: 18 U.S.C. § 201(c)(1)(B)**

**Case: 2:22-cr-20093**

**Judge: Hood, Denise Page**

**MJ: Stafford, Elizabeth A.**

**Filed : 2/23/2022**

**INFO USA V BERLUCCHI (LH)**

**Defendant.**

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT ONE**

**18 U.S.C. § 201(c)(1)(B)**

**Bribery of a Public Official**

**D-1, THOMAS BERLUCCHI,**

From on or about 2013 to 2018, in the Eastern District of Michigan, Southern Division, defendant **THOMAS BERLUCCHI**, a public official and facilities engineer for the United States Postal Service, otherwise than as provided by law for the proper discharge of official duties, directly and indirectly did demand, seek, receive, accept, and agree to receive and accept something of value—namely, free construction work on **BERLUCCHI**'s cottage, free hotel

rooms, and donations to **BERLUCCHI's** preferred organization—personally for and because of an official act performed and to be performed by such official, that is awarding United States Postal Services contracts to Michael Rymar's company Horizons Materials & Management, LLC.

All in violation of Title 18, United States Code, Section 201(c)(1)(B).

DAWN N. ISON  
United States Attorney



---

STEVEN P. CARES  
Assistant United States Attorney  
211 W. Fort Street, Ste. 2001  
Detroit, MI 48226  
313-226-9139  
[Steven.Cares@usdoj.gov](mailto:Steven.Cares@usdoj.gov)



---

DAVID A. GARDEY  
Chief, Public Corruption Unit  
211 W. Fort Street, Ste. 2001  
Detroit, MI 48226  
313-226-9591  
[David.Gardey@usdoj.gov](mailto:David.Gardey@usdoj.gov)

Dated: February 23, 2022

(Companion Case information MUST be completed by AUSA and initialed.)

United States District Court  
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**  
**2:22-cr-20093**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Companion Case Information****Companion Case Number:** 21-cr-20208This may be a companion case based upon LCrR 57.10 (b)(4)<sup>1</sup>:**Judge Assigned:** David M. Lawson☒ **Yes**☐ **No****AUSA's Initials:** spc**Case Title:** USA v. Thomas Berlucchi**County where offense occurred :** Oakland**Check One:** ☒ **Felony**☐ **Misdemeanor**☐ **Petty**       Indictment/ ☒ Information --- **no** prior complaint.       Indictment/        Information --- based upon prior complaint [Case number: \_\_\_\_\_]       Indictment/        Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:**Defendant name****Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**February 23, 2022

Date

/s/ Steven P. Cares

STEVEN P. CARES

Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, MI 48226-3277

Phone: 313-226-9139

Fax: 313-226-3271

E-Mail address: steven.cares@usdoj.gov

Attorney Bar #: P68503

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.